

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

AARON LARRY BOWMAN

VS.

**OUACHITA PARISH SHERIFF'S
OFFICE, ET AL.**

CIVIL ACTION NO:

3:20-cv-01372

JUDGE TERRY A. DOUGHTY

**MAGISTRATE JUDGE
KAREN L. HAYES**

**MOTION FOR EXTENSION OF TIME TO OPPOSE DEFENDANT’S MOTION TO
DISMISS COMPLAINT (THIRD REQUEST) (UNOPPOSED)**

NOW COMES the Plaintiff, Aaron Larry Bowman, through the Undersigned, who respectfully requests an extension of time to file responsive pleadings in this matter for the following reasons:

1. This tort and civil rights action was filed in Louisiana state court on September 21, 2020.
2. This matter was removed to federal court on October 22, 2020.
3. Louisiana Public Safety & Corrections Defendants previously filed a Motion to Dismiss for Failure to State a Claim and for Lack of Jurisdiction with Defendants being erroneously named as Louisiana State Police in 12(b) motions on October 29, 2020.
4. Co- Defendants, the University of Louisiana System Board of Supervisors, City of Monroe, Monroe Police Department, Deputy Donovan Ginn, and Parish Sheriff Jay Russell have likewise filed Rule 12(b) motions to dismiss the suit.
5. Plaintiff's Motion for Extension of Time was granted and extended to December 4, 2020.
6. At that time, Plaintiff requested an additional extension of time due to his Counsel/the Undersigned's immediate family members being diagnosed with Covid-19. Accordingly, the Undersigned was forced to care for her family during that time.
7. Plaintiff and Counsel recently learned that an additional Defendant, Trooper Jacob Brown, with the Louisiana State Police has been arrested and charged with Aggravated Second-Degree Battery and Malfeasance in Office on December 10, 2020. As such, Plaintiff's Petition must be amended and additional time given to respond to the pending 12(b) motions.

8. Plaintiff has confirmed, through opposing counsel, that there is no objection to the requested extension.

WHEREFORE, the premises considered, Plaintiff, Aaron Larry Bowman, requests an extension of time to file responsive pleadings for an additional twenty-one (21) days after the noted deadline of December 24, 2020.

Respectfully submitted,

/s/ Donecia Banks-Miley
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing Motion for Extension of Time to Oppose Defendant's Motion has been electronically filed with the Clerk of Court using the CM/ECF filing system. Notice of this filing will be forwarded to all counsel by operation of the Court's electronic filing system.

Monroe, Louisiana, this 24th day of December 2020.

/s/ Donecia Banks-Miley
Donecia Banks-Miley, #35641

